



Department of Energy

ALBUQUERQUE OPERATIONS  
ROCKY FLATS AREA OFFICE  
P.O. BOX 892  
GOLDEN, COLORADO 80402-0928

DOE/CIO/EG&G  
NOV 19 1992  
NORTHERN COLORADO

7446

OCT 06 1992

92-DOE-11766

Mr. Martin Hesmark  
U.S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WMC  
Denver, Colorado 80202-2405

Dear Mr. Hesmark:

Your August 4, 1992, letter to DOE Rocky Flats Office requested DOE to:

1. delineate a boundary for OU-3;
2. delineate "areas of concern" for construction activities;
3. identify construction projects within these bounds;
4. attend a meeting on August 27, 1992, with EPA and CDH.

DOE and EG&G staff met with EPA and CDH on the proposed August 27, 1992, date and presented a response to your August 4, 1992, letter. At that time, EG&G presented a comparison of dose and risk to EPA and CDH, and showed that "no areas of concern" could be delineated, except perhaps, small portions of the Settlement Agreement lands. EPA provided disparate guidance and instructed DOE to rework the problem using krieged data, and to take americium into account in the calculations.

This additional work has taken DOE beyond the September 30, 1992, EPA-requested deadline, and DOE requested an extension to the October 15, 1992, to complete the task. DOE has completed a rigorous data analysis, which includes americium, and the results are enclosed.

In response to your August 4, 1992, letter, the object of the Final OU-3 RFI/RI Work Plan, which was approved by EPA and CDH on March 17, 1992, is to develop a boundary for OU-3 based on risk. The OU-3 Work Plan delineates an OU-3 study area. Until the OU-3 Final RFI/RI Report is approved by EPA and CDH, a boundary for OU-3 will, by definition, be ambiguous.

Based on the enclosed analysis, no offsite "areas of concern" can be delineated under the recreational scenario. Under a residential scenario, a small "area of concern" can be delineated in a portion of the Settlement Agreement land. The present and future land use of this area, according to the present landowners - Jefferson County and the City of Broomfield, is open space and recreational and park facilities. The recreational scenario is the appropriate risk scenario in the expected future.

Mr. Hestmark

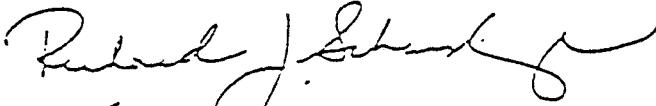
2

The enclosed analysis was performed to determine if any actions are needed to protect human health during the course of the OU-3 RFI/RI investigation. (This is not baseline risk assessment to determine remedial actions.) Clearly, no actions are warranted. The baseline risk assessment will be performed as part of the RFI/RI report for OU-3. The IAG scheduled delivery date for the draft report is July 16, 1993, and the Final Report is scheduled for December 13, 1993.

There are no current or planned construction activities within the bounds outlined by the residential scenario of which DOE is aware, and no "areas of concern" at all under the appropriate recreational scenario.

Given EPA's August 4, 1992, and preceding letters regarding DOE's responsibilities under CERCLA, DOE wishes to point out that DOE is clearly lead for CERCLA activities. However, the DOE is not the regulatory lead for all enforcement activities in and around the Rocky Flats Plant. We believe both the Colorado Department of Health and Environmental Protection Agency retain their regulatory responsibilities and authorities despite the DOE's CERCLA lead role.

Sincerely,

  
Frazer R. Lockhart  
Director  
Environmental Restoration Division

Enclosure

cc w/encl:  
J. Ciocco, EM-453  
K. Izell, OCC, RFO  
M. Roy, OCC, RFO  
M. Van Der Puy, WMED, RFO  
G. Hill, WMED, RFO  
R. Benedetti, EG&G  
M. Guillaume, EG&G  
D. Smith, EG&G  
B. Lavelle, EPA  
J. Schieffelin, CDH  
C. Spreng, CDH  
W. Christopher, Westminster  
S. Nachtrieb, Westminster  
M. Tucker, Jefferson County